

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

<p>PLANNED PARENTHOOD OF THE HEARTLAND, INC., and JILL MEADOWS. M.D.,</p> <p>Petitioners,</p> <p>v.</p> <p>TERRY E. BRANSTAD and IOWA BOARD OF MEDICINE,</p> <p>Respondents.</p>	<p>Equity Case No. <u>EQCE081503</u></p> <p>ANSWER (SUBJECT TO MOTION TO DISMISS)</p>
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COME NOW Respondents Terry E. Branstad and Iowa Board of Medicine and, through undersigned counsel and subject to the motion to dismiss filed on May 23, 2017, answer the Petition for declaratory and injunctive relief as follows:

STATEMENT OF THE CASE

1. Admitted.
2. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.
3. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.
4. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.
5. Denied.
6. Denied.

PARTIES

7. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

8. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

9. Admitted.

10. Admitted.

JURISDICTION AND VENUE

11. Admitted.

12. Admitted.

OPERATIVE FACTS

I. Abortion Background

13. Denied.

14. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

15. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

16. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

17. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

18. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

II. Informed Consent in Iowa

19. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

20. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

21. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

22. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

III. The Act

23. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

24. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

25. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

26. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

27. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

28. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

29. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

30. Admitted.

IV. Effects of the Act

31. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. Denied.

43. Denied.

44. Denied.

45. Respondent lack sufficient information to admit or deny the allegations contained in this paragraph, and they are thus denied.

46. Denied.

47. Denied.

48. Denied.

49. Respondents answer that Iowa law speaks for itself. Any remaining allegations contained in this paragraph are denied.

50. Denied.

51. Denied.

52. Denied.

53. Denied.

54. Denied.

55. Denied.

COUNT ONE – RIGHT TO DUE PROCESS

56. Respondents reassert each answer as set forth in paragraphs 1-55.

57. Denied.

COUNT TWO – RIGHT TO EQUAL PROTECTION

58. Respondents reassert each answer as set forth in paragraphs 1-57.

59. Denied.

COUNT THREE – VAGUENESS

60. Respondents reassert each answer as set forth in paragraphs 1-59.

61. Denied.

PRAYER FOR RELIEF

62. Respondents reassert each answer as set forth in paragraphs 1-61.

63. Denied.

64. Denied.

WHEREFORE, Respondent respectfully requests that Petition for declaratory and injunctive relief be denied.

Respectfully submitted,

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ATTORNEY GENERAL OF IOWA

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/s/ _____
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